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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**
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12 RICHARD KADREY, *et al.*,

13 Individual and Representative
14 Plaintiffs,

15 v.

16 META PLATFORMS, INC, a Delaware
corporation,

17 Defendant.
18

Case No. 3:23-cv-03417-VC

**STIPULATION AND [PROPOSED]
ORDER RE EXPERT DISCOVERY
DEADLINE**

19 Pursuant to Civ. L.R. 6-2 and 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher
20 Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang,
21 Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and Christopher
22 Farnsworth (“Plaintiffs”); and Defendant Meta Platforms, Inc. (“Defendant”) (collectively, the
23 “Parties”), by and through their respective counsel, stipulate to the following:

24 WHEREAS, the expert discovery deadline is presently February 26, 2025, ECF No. 238;

25 WHEREAS, to accommodate deposition scheduling, medical-related issues, and travel
26 conflicts with certain experts, the Parties agree to seek the Court’s leave to extend the expert
27 discovery deadline to Friday, March 7, which is nine days after the current February 26 expert
28 discovery deadline, to allow for the depositions of Ms. Barbera Frederiksen-Cross, Dr. Daniel

1 Spulber, Dr. Michael Sinkinson, and Dr. Jonathan Krein, as well as the supplemental deposition of
2 Dr. Crista Lopes;

3 WHEREAS, there have been two prior modifications to the expert discovery schedule, the
4 first being the extension of the expert discovery deadline until February 26, 2025, ECF No. 238,
5 and the second being the Court's accepting a February 10, 2025 deadline for Defendant's rebuttal
6 to the Krein Expert Report, ECF No. 406;

7 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through
8 Plaintiffs and Defendant, as represented by their undersigned counsel and subject to the approval
9 of the Court, that the expert discovery deadline is extended to March 7, 2025. No other deadlines
10 are modified by this stipulation, nor does this stipulation affect the rights of any party to seek relief
11 with respect to other discovery or scheduling issues, including any issues that may be raised at the
12 February 27, 2025 hearing, or any expert discovery or reports.

1 Dated: February 26, 2025

Respectfully Submitted,

2 By: /s/ Phillip Morton

By: /s/ Jay Schuffenhauer

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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

PROPOSED ORDER

Pursuant to the stipulation of the Parties, **IT IS SO ORDERED.**

DATED: _____

HON. VINCE CHHABRIA
United States District Judge

ECF ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Defendant concurs in the filing of this document.

/s/ Jay Schuffenhauer